# IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: GENERIC PHARMACEUTICALS PRICING ANTITRUST LITIGATION

MDL No. 2724 Case No. 2:16-MD-02724

THIS DOCUMENT RELATES TO:

Hon. Cynthia M. Rufe

**ALL ACTIONS** 

# DEFENDANTS' RESPONSE IN SUPPORT OF INTERVENOR UNITED STATES OF AMERICA'S MOTION FOR A LIMITED STAY OF DISCOVERY

For the reasons set forth in the Court's February 9 and May 7, 2021 Orders, (ECF Nos. ECF Nos. 1679-80, 1769), the Defendants' position as set forth in the Parties August 31, 2021 Joint Submission, (ECF No. 1816), and certain Defendants' motions, (ECF Nos. 1536, 1537, 1578, 1615, 1622, 1636, 1668, 1731), Defendants respectfully request that the Court continue the narrowly tailored stay implemented through Pretrial Order ("PTO") No. 181, (ECF No. 1820), and grant Intervenor United States of America's Motion for a Limited Stay of Discovery, (ECF No. 1908).

<sup>&</sup>lt;sup>1</sup> Furthermore, by joining here, certain indicted defendants do not waive any objections previously raised in the criminal matter to DOJ's characterization of the scope of the government's evidence in the criminal cases. *See*, *e.g.*, Motion at 7 (characterizing dermatology complaint as inclusive of "many of the same products named in the indictments").

Dated: January 3, 2022

## /s/ Jan P. Levine

Jan P. Levine

TROUTMAN PEPPER HAMILTON SANDERS

LLP

3000 Two Logan Square Eighteenth & Arch Streets

Philadelphia, Pennsylvania 19103

Tel.: (215) 981-4714 Fax: (215) 359-1606 jan.levine@troutman.com

# /s/ Sheron Korpus

Sheron Korpus

KASOWITZ BENSON TORRES LLP

1633 Broadway

New York, New York 10019

Tel.: (212) 506-1700 Fax: (212) 506-1800 skorpus@kasowitz.com

#### /s/ Chul Pak

Chul Pak

WILSON SONSINI GOODRICH & ROSATI

**Professional Corporation** 

1301 Avenue of the Americas, 40th Floor

New York, New York 10019

Tel.: (212) 999-5800 Fax: (212) 999-5899 cpak@wsgr.com

Defense Liaison Counsel

## /s/ Devora W. Allon

Devora W. Allon

KIRKLAND & ELLIS LLP

601 Lexington Avenue

New York, New York 10022

Tel.: (212) 446-4800 Fax: (212) 446-4900

devora.allon@kirkland.com

## /s/ Sarah F. Kirkpatrick

Sarah F. Kirkpatrick

WILLIAMS & CONNOLLY

LLP

725 Twelfth Street, N.W. Washington, D.C. 20005

Tel.: (202) 434-5000 Fax: (202) 434-5029 skirkpatrick@wc.com